

Exhibit 2

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May 18, 2020

BY ELECTRONIC MAIL

Susanna Buergel
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1285 Avenue of the Americas
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Kaloma Cardwell v. Davis Polk & Wardwell LLP, et al.
(Case No. 1:19-cv-10256-GHW)

Dear Susanna and Bruce:

We hope things are well with yourselves and your respective families.

We write in response to your April 30, 2020 letter.

First, with respect to the mediation, we appreciate your work in obtaining a postponement. Please contact us when Defendants are in a position to discuss alternative dates, so the parties can make a joint proposal to [REDACTED].

Second, with respect to Defendants' motion to dismiss, we intend to seek leave to respond to the motion on June 4, which extends the current May 21st deadline by 14 days. We also intend to request five additional pages for our opposition brief. Please let us know if Defendants consent to the above proposal so we can apprise the Court accordingly.

Third, we appreciate your "willingness to discuss" the "serious disruptions caused by the present crisis," and, specifically, the impact of such disruptions on discovery. 4/30 Letter from S. Buergel to Plaintiff at 2. Plaintiff believes the parties would benefit from additional time to propound and respond to preliminary discovery requests. Such is true particularly where Plaintiff's deadline to respond fell in the middle of the very public health crisis noted in your letter.

Thus, we seek your consent to serve responses and objections to your outstanding requests and serve our own within 30 days of our response to the motion to dismiss. Under Plaintiff's proposal, both parties will propound its requests by July 4, 2020, and the extension will not compromise the current September 16, 2020 fact discovery deadline. Please let us know if Defendants consent so that we can apprise the Court of your position.

In an effort to remain in compliance with Judge Woods's Individual Rules of Practice related to extensions of time we intend to seek relief from the Court later today regarding both our request for an extension and inclusion of additional pages in our opposition. We are available to meet and confer prior to contacting the Court should you wish to discuss any of the foregoing proposals or requests.

Kind regards,



David Jeffries